

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA

Plaintiffs,

v.

**COMMONWEALTH OF PUERTO RICO,
et. al.**

Defendants.

CIVIL NO. 12-2039 (GAG)

**MOTION FOR LEAVE TO FILE PRPD'S FIRST BI-ANNUAL STATUS REPORT FOR
THE YEAR 2017 IN COMPLIANCE WITH REQUIREMENT 261 OF THE AGREEMENT
TO THE HONORABLE COURT:**

COME NOW the COMMONWEALTH OF PUERTO RICO and the PUERTO RICO POLICE DEPARTMENT, through the undersigned counsel, and respectfully allege and pray as follows.

1. In accordance with Paragraph 261 of the Agreement for the Sustainable Reform of the Puerto Rico Police Department, PRPD submitted a sealed version of its First Bi-Annual Status Report for the Year 2017 on May 25, 2017 to the Court, the Technical Compliance Advisor and counsel for the Department of Justice.
2. PRPD respectfully requests leave to file its First Bi-Annual Status Report for the Year 2017 unsealed.

WHEREFORE, PRPD respectfully requests that this Court grants leave to file First Bi-Annual Status Report for the Year 2017 unsealed.

I HEREBY CERTIFY that on this same date, I electronically filed the foregoing with the Clerk of the Court using CM/ECF system which will send notification of such filing to all attorneys of record.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on August 8th, 2017.

WANDA VÁZQUEZ GARCED

Secretary of Justice

WANDYMAR BURGOS VARGAS

Deputy Secretary in Charge of
Litigation
Department of Justice

SUSANA PEÑAGARÍCANO BROWN

Director of Federal Litigation
and Bankruptcy Division

S/JOEL TORRES ORTIZ

Joel Torres Ortiz

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